

REMARKS

Claims 1, 3, 4, 6-11, 13, 15-21, 23, 24, 26-31, 33, 34, 36-40, 42, 43, and 45-48 remain in the application with claims 11, 15, 16, 21, 26, 27, 31, 36, 37, 40 and 45 having been amended hereby and claims 14, 25, 35 and 44 having been canceled, without prejudice or disclaimer.

Reconsideration is respectfully requested of the rejection of claims 1, 3, 4, 6, 7, 9, 11, 14-16, 18, 19, 21, 26, 36, and 45 under 35 U.S.C. 103(a), as being unpatentable over *Circello, et al.* in view of *Ryan* and further in view of *Funk, et al.*

As previously discussed, an exemplary embodiment of the present invention provides a packetized command from a bus master controller in an application processor to control a plurality of external peripheral units that are connected through a common bus to the bus master controller of the application processor. A shared memory is controlled by the bus master controller and is connected to a modem by a second common bus and to the application processor by the first common bus. The common master controller replaces individual interface controllers previously required, and the shared memory is used for data communication between the application processor and the modulator demodulator.

Circello, et al. relates to a processor connected to a system bus controller by a plurality of buses and the system bus controller is, in turn, connected to external devices by a system bus. The external devices may comprise different kinds of memory devices. It will be noted that *Circello, et al.* does not suggest the use of a modem as in the presently claimed invention. Furthermore, there is no shared memory suggested in *Circello, et al.* because, in

fact, *Circello, et al.* does not have a modem with which to share a memory between the processor and such device, which is not shown or suggested. More importantly, *Circello, et al.* is completely silent concerning the use of a packet generator issuing packetized commands sent to the peripheral devices. There is no reason stated why it would have been obvious to connect the processor of *Circello, et al.* to a modem as proposed by the Examiner.

Ryan is cited for showing a shared memory. *Ryan* relates to a system for downloading executable memory images in computing devices comprised of multiple processors and a mobile station modem. *Ryan* discloses that by not clocking the modem computing system and the shared memory during times when the modem function is not needed, power can be conserved. Although *Ryan* does disclose a shared memory module between a computer and a modem, there is no suggestion how such a system could be integrated with the *Circello, et al.* programmable access apparatus.

Funk, et al. is cited for showing a digital signal processor.

Funk, et al. is cited for showing a signal modem and provides a portable wireless data terminal permitting transmission to remote locations of data and display of remote data. A wireless data communication modem operates as a peripheral to the host computing device. It is disclosed that the digital signal processor being employed is located external to the modem.

In the rejection, it is stated that *Funk, et al.* discloses a bus master controller 111 shown in FIG. 4. On the contrary, that is not a bus master controller but, in fact, is a bus interface following the standard PCMCIA card interface. The rejection states that the master

controller controls a plurality of external peripherals using a packet generator. Nevertheless, such external peripherals are not shown or suggested in *Funk, et al.* Moreover, there is no disclosure that the plurality of external peripherals, which are not disclosed, are connected over a common bus as supposed by the Examiner.

Thus, the Examiner has attempted to find various elements of the presently claimed invention in the several references. Nevertheless, it is respectfully submitted that there is no suggestion to make the combination provided by the present invention found in any of the cited references. In order to render such a combination obvious, there must be some suggestion in the references of the benefits to be had by making this combination. On the contrary, the presently claimed invention is being used as an instruction manual for making a selection of various elements from the cited references. Moreover, there is no suggestion in any reference of how the modem and shared memory bank would be included in *Circello, et al.* Furthermore, the standalone communication modem of *Funk, et al.* does not appear to be able to be substituted into the communication system of *Ryan*. In order to make the suggested combination something more than simply plugging in various elements is required, that is, inventive effort is required in order to make the combination as proposed by the Examiner.

Reconsideration is respectfully requested of the rejection of claims 8 and 17 under 35 U.S.C. 103(a), as being unpatentable over *Circello, et al.* in view of *Ryan* and further in view of *Funk, et al.* and *Watanabe, et al.* Although *Watanabe, et al.* relates to the use of a strobe signal, claims 8 and 17 depend from claims 1 and 11, respectively, which claims are thought

to be patentably distinct over the combination of the references and, for at least those very same reasons, claims 8 and 17 are also submitted to be patentably distinct thereover. Adding further fuel to the argument that there is no suggestion to make the combination as suggested by the Examiner, adding a further reference such as *Watanabe, et al.* emphasizes that argument.

Reconsideration is respectfully requested of the rejection of claims 10 and 20 under 35 U.S.C. 103(a), as being unpatentable over *Circello, et al.* in view of *Ryan* and further in view of *Funk, et al.* and *Fueki*. Claims 10 and 20 depend from claims 1 and 11, respectively, which claims are thought to be patentably distinct over the cited references. Even though *Fueki* shows use of a protection circuit, it is respectfully submitted that *Fueki* does not cure the deficiencies of the cited references as discussed hereinabove.

Reconsideration is respectfully requested of the rejection of claim 13 under 35 U.S.C. 103(a), as being unpatentable over *Circello, et al.* in view of *Ryan* and further in view of *Funk, et al.* and *Wioska, et al.*

Claim 13 depends from claim 11 which, for the reasons set forth hereinabove, is thought to be patentably distinct over the cited references and, for at least those very same reasons, claim 13 is also submitted to be patentably distinct thereover. *Wioska, et al.* does not cure the deficiencies of the cited references as discussed hereinabove.

Reconsideration is respectfully requested of the rejection of claims 21-25, 27, 29, 31, 33-35, 37, 39, 40, 42-44, and 46 under 35 U.S.C. 103(a), as being unpatentable over *Circello, et al.* in view of *Ryan*.

These references have been discussed hereinabove and the reasons for their failing to render obvious the present invention have been set forth. Even further, no reference describes the packetized command fed to the plurality of peripheral units as containing a module device select signal used to select one of the plurality of external peripherals.

Accordingly, it is respectfully submitted that the combination of *Circello, et al.* and *Ryan* fail to render obvious the present invention, as recited in the amended claims.

Reconsideration is respectfully requested of the rejection of claims 28, 38, and 47 under 35 U.S.C. 103(a), as being unpatentable over *Circello, et al.* in view of *Ryan* and further in view of *Watanabe, et al.*

Claims 28, 38, and 47 depend respectively from independent claims 21, 31, and 40, which independent claims have been discussed hereinabove and are thought to be patentably distinct over the cited references. *Watanabe, et al.*'s use of a strobe signal does not provide any suggestion to make a combination of *Ryan* and *Circello, et al.*, as suggested by the Examiner and, thus, does not cure the deficiencies of the underlying rejection of the independent claims.


Reconsideration is respectfully requested of the rejection of claims 30 and 48 under 35 U.S.C. 103(a), as being unpatentable over *Circello, et al.* in view of *Ryan* and further in view of *Fueki*. Dependent claims 30 and 48 depend from independent claims 21 and 40, respectively, which independent claims are thought to be patentably distinct over the cited references. Whatever protection circuit *Fueki* provides does not suggest the selective combination of features from *Circello, et al.* and *Ryan* as proposed in the rejection.

Accordingly, by reason of the amendments made to the claims hereby, as well as the above remarks, it is respectfully submitted that a communication device in which a bus master controller communicates over a common bus with a shared memory that in turn communicates with a modem using packetized data and in which a module device select signal is transmitted so as to select one of a plurality of external peripherals also connected to the common bus, as taught by the present invention and as recited in the amended claims.

Entry of this Amendment is earnestly solicited and it is respectfully submitted that this amendment raises no new issues requiring further consideration and/or search because all the amendments made to the claims were made based upon previously presented dependent claims.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,
F. CHAU & ASSOCIATES, LLC



Jay H. Maioli
Reg. No. 27,213
Attorney for Applicants

Dated: July 19, 2007

Mailing Address:

F. Chau & Associates, LLC
130 Woodbury Road
Woodbury, NY 11797
TEL.: (516) 692-8888
FAX: (516) 692-8889